

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

**DRAFT**

Conditional Major, Construction / Operating

Permit: F-06-075

Stantek, LLC

Stanton, KY 40380

12/15/06

Yelena Goldin, Reviewer

SOURCE ID: 21-197-00017

SOURCE A.I. #: 65995

ACTIVITY ID: APE20060001

**SOURCE DESCRIPTION:**

Stantek is a contract manufacturer that was established in 2003. The facility currently is engaged in wire harness and electromechanical assembly, metal fabrication, and toner cartridge remanufacturing. Stantek is proposing to construct a paint booth to offer contract painting services to their customers.

**COMMENTS:**

For EP#1 particulate emissions are controlled by 3 sided spray booth with filters, which the manufacturer estimates to be 90% percent efficient. For EP#2 three baghouse filters estimated to be 99% efficient are used. The spray gun is assumed to have 75% transfer efficiency. The overall control efficiency for both points is then applied to determine the after-control emissions.

- The emission of Volatile Organic Compounds (VOC) is determined by material balance assuming the entire content of VOC in the paint is emitted.
- The source is not subject to 40 CFR Part 63, Subpart M: Surface Coating of Miscellaneous Metal Parts and Products. The Federally Enforceable permit conditions will limit this source to minor source status and preclude the applicability of Subpart M.
- The source is not subject to 401 KAR 59:225: New miscellaneous metal parts and products surface coating operations; as they have accepted Federally Enforceable permit conditions which limit them to area source status. Regulation 59:225 is not applicable to minor sources which are located in a county designated attainment for ozone.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

VOC emissions shall not exceed 90 tons during any consecutive twelve (12) month period. Monthly records to demonstrate compliance with this limitation shall be maintained, and total VOC emissions shall be reported semiannually.

The booth will be required to use filters and be operated and maintained in accordance with the manufacturer's recommendations in order to be in compliance with the mass standards specified in 401 KAR 59:010.

Stantek, LLC has voluntarily requested permit limitations on the potential to emit. The

source will limit VOC emissions to 90 TPY or less, and HAP emissions will be limited to 9 TPY for any single HAP and 22.5 TPY for combined HAPs.

**PERIODIC MONITORING:**

Given the control devices used (filters) at the booth, there is a little chance of violating a mass or opacity standard. For this reason, direct measurements of mass and opacity emissions will not be required, but some assurance that the filters are working properly will be needed. Visual inspection of the filters each day painting is done and proper maintenance are sufficient to assure that the filters are working properly.

Only record keeping is required to demonstrate compliance with the applicable Conditional Major limitation.

**OPERATIONAL FLEXIBILITY:**

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.